

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
	:	
RICHARDSON BURGESS	:	
	:	
Debtor	:	BANKRUPTCY NO. 19-11543
	:	
	:	
Wilmington Savings Fund Society	:	
Movant	:	

**DEBTOR'S ANSWER TO MOTION FOR RELIEF FROM THE AUTOMATIC
STAY FILED BY WILMINGTON SAVINGS FUND SOCIETY**

NOW COMES RICHARDSON BURGESS, by and through his attorney Ashley M. Sullivan, Esquire, and hereby files an answer to the Motion for Relief from the Automatic Stay.

1. Admitted.
2. Admitted
3. Admitted.
4. Admitted.
5. Admitted.
6. Denied. Debtor denies the allegations set forth in Paragraph 7 and strict proof thereof is demanded.
7. Denied. Debtor denies the allegations set forth in Paragraph 8 and strict proof thereof is demanded.
8. Denied. Debtor has sufficient funds to cure any present delinquency.
9. Denied. The most recent records from the Chapter 13 Trustee indicate that Debtor is not delinquent.
10. Denied.
11. Denied.

WHEREFORE, Respondent respectfully requests that Movant's Motion to Relief from the Automatic Stay be denied.

FREEDMAN AND LORRY, P.C.

BY: /s/ Ashley M. Sullivan

ASHLEY M. SULLIVAN, ESQUIRE
Attorney for Debtor

CERTIFICATION

Petitioner certifies under penalty of perjury that the matters stated herein are true and correct to the best of her knowledge, information, and belief.

DATE: July 15, 2019

ATTORNEYS FOR DEBTOR

/s/ Ashley M. Sullivan
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